

UNITED STATES DISTRICT COURT

for the

District of New Jersey



Division

Princess L. Brown

) Case No.

) *(to be filled in by the Clerk's Office)*

)

)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Department of Veterans Affairs
Laura Wright) Jury Trial: *(check one)* Yes No

)

)

)

)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Princess L. Brown
Street Address	104 Haddon Rd
City and County	Browns Mills
State and Zip Code	NJ 08015
Telephone Number	6098155288
E-mail Address	p264b@aol.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	<u>Department of Veterans Affairs</u>
Job or Title (<i>if known</i>)	
Street Address	<u>5000 Wissahickon Ave</u>
City and County	<u>Philadelphia</u>
State and Zip Code	<u>PA 19144</u>
Telephone Number	<u>215.842.2000</u>
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	<u>Laura Wright</u>
Job or Title (<i>if known</i>)	<u>Insurance Specialist</u>
Street Address	<u>5000 Wissahickon Ave</u>
City and County	<u>Philadelphia</u>
State and Zip Code	<u>PA 19144</u>
Telephone Number	<u>215.842.2000</u>
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	<u>N/A</u>
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	<u>N/A</u>
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

440-Other Civil Rights, 790-Other Labor Litigation, and 895-Freedom of information Request

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Princess L. Brown , is a citizen of the
State of *(name)* NJ

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____
and has its principal place of business in the State of *(name)* _____

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Laura Wright , is a citizen of
the State of *(name)* PA . Or is a citizen of
(foreign nation) _____

b. If the defendant is a corporation

The defendant, (name) Department of Veterans Affairs , is incorporated under the laws of the State of (name) PA , and has its principal place of business in the State of (name) PA .
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

N/A

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On 6/2/2017, former Dept Manager, Laura Wright & Dept of Veterans Affairs, authorized a false police report against me. My congressman investigated the issue as well. Laura Wright had just been removed from her position on 6/1/2017 and was angry. She abused her authority in order to reprise against me. This charge was listed as one of few issues on appeal with EEOC that I lost. I also have experienced harrassment at Philly airport when traveling to visit grandchildren. VA refused to make the police report available. They sent two completely blank pages to the judge. This caused me to lose my rights of privacy. Making false claims to law enforcement is dangerous. I have camaraderie with my fellow employees & immediate supervisor. I did nothing wrong.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. Order VA to provide the full police report to me.
2. Take actions to correct the false reporting.
3. Provide copy of a letter to me that indicates the correction to the false report.
4. Pay 5 years worth of my whole current GS9-step 7 annual salary before my hrs were reduced due to health reasons and VA pay all court costs/fees.
5. Stipulate a timeline (within 30 days-preferably) to complete the actions if case is decided in my favor.

I have documented health problems. I suffered a heart attack behind the "fall out" of this matter and EEOC case. I never had any discipline issues and had all due promotions. I am not able to gain any other jobs in the government because of this situation they got me into. Laura Wright & VA continue to allow the false police report to exist because there are more believeble stigmas placed on elder African American females. They placed my life in danger. Laura Wright and VA got so many people in the VA and other agencies involved-knowingly and unknowingly. People are more likely to "cover up" or even cause me great harm/fatality rather than expose the wrong actions towards me behind this false reporting. My rights to provecy no longer exists because of this issue.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/15/2021

Signature of Plaintiff



Printed Name of Plaintiff

Princess L. Brown

B. For Attorneys

Date of signing: _____

Signature of Attorney

N/A

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
